

# EXHIBIT I

# **EXHIBIT 11**

**From:** Loftus, Julie  
**To:** Bill Mohrman  
**Cc:** Bloom, Michael; Rogers, Brooke; Andrew Parker; Joe Pull; Roxanne A. Russell  
**Subject:** RE: Lindell - Fanning Deposition  
**Date:** Tuesday, August 1, 2023 1:53:39 PM  
**Attachments:** 2023.08.01 Amended Notice of Deposition - Mary Fanning.pdf  
image561882.jpg

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Bill,

We are sorry to hear about Ms. Fanning's injuries.

As you are aware, your client must be deposed by **August 25, 2023**. To the extent Ms. Fanning is medically capable of testifying, she will need to give deposition testimony before that date. I am attaching an amended notice of deposition for **August 17, 2023**. I am calling you to discuss.

Best,  
Julie

Julie Loftus  
(she/her/hers)  
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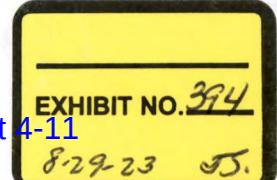
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**From:** Bill Mohrman <mohrman@mklaw.com>  
**Sent:** Tuesday, August 1, 2023 12:33 PM  
**To:** Loftus, Julie <JLoftus@beneschlaw.com>  
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**Subject:** RE: Lindell - Fanning Deposition

Everyone:

Mary Fanning had an accident on Sunday which resulted in her being admitted to a hospital yesterday. Ms. Fanning was diagnosed with a concussion and other injuries. She will not be able to be deposed on Friday. I will keep you updated on when she will be well enough to attend a deposition. Bill.

William F. Mohrman  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,  
SMARTMATIC INTERNATIONAL  
HOLDING B.V., and SGO  
CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY  
PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-WMW-JFD

**PLAINTIFFS' AMENDED NOTICE OF DEPOSITION OF MARY FANNING**

**TO: ALL COUNSEL OF RECORD.**

**PLEASE TAKE NOTICE** that Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited, by and through their undersigned attorneys, and under the Federal Rules of Civil Procedure, will take the deposition of the following individual, to be recorded by both videography and stenographic means, at the following time and place listed below.

<b>Deponent</b>	<b>Place of Deposition</b>	<b>Date and Time</b>
Mary Fanning	Lake Geneva, WI Location details TBD	August 17, 2023 at 9:00 a.m. CST

/s/ Julie M. Loftus

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*Attorneys for the Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 1, 2023 a true and correct copy of the foregoing deposition notice was served via email to the following attorneys of record:

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*/s/Julie M. Loftus*

Julie M. Loftus